

JASON M. FRIERSON
United States Attorney
Nevada Bar Number 7709
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney
Nevada Bar No. 1925
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Daniel.Hollingsworth@usdoj.gov
Attorneys for the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SYLVIANE DELLA WHITMORE,
a/k/a: "Sylviane Cordova,"

Defendant.

2:17-CR-110-APG-DJA

**United States of America's Unopposed
Motion to Approve Sale Price and Sale
Terms for Real Property Located at 3189
Pinehurst Drive, Unit C, Las Vegas,
Nevada 89109**

The United States moves this Court to approve a sale of 3189 Pinehurst Drive, Unit C, Las Vegas, Nevada 89109 (property)¹ for \$300,000.

¹ MORE PARTICULARLY DESCRIBED AS:

PARCEL I: UNIT "C," BUILDING ELEVEN (11) OF LAS VEGAS INTERNATIONAL COUNTRY CLUB ESTATES - TOWNHOME CONDOMINIUMS - PHASE 1, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 14 OF PLATS, PAGE 10, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA.

PARCEL II: AN UNDIVIDED 1/47TH INTEREST IN AND TO THE COMMON AREAS TOGETHER WITH AN EXCLUSIVE EASEMENT TO USE PARKING SPACE NO. 11-C OF LAS VEGAS INTERNATIONAL COUNTRY CLUB ESTATES - TOWNHOUSE CONDOMINIUMS PHASE ONE, AS THE SAME IS ESTABLISHED IN THE PLAN RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA, IN BOOK 14, PAGE 10, AND AS AMENDED IN BOOK 205, PAGE 164, AND THE DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA, OFFICIAL RECORDS, BOOK 206, AS DOCUMENT NO. 165836;

PARCEL III: THE FOLLOWING APPURTENANT EASEMENT: AN EXCLUSIVE EASEMENT FOR INGRESS AND EGRESS OVER CERTAIN STREETS CREATED IN THE DECLARATION OF EASEMENTS, RIGHTS, CONDITIONS AND RESTRICTIONS RECORDED IN BOOK 941 AS INSTRUMENT NO. 755353 AND IN THE DECLARATION OF EASEMENTS, RIGHTS, CONDITIONS AND RESTRICTIONS RECORDED IN BOOK 941 AS INSTRUMENT NO. 755358,

1 The reason for this request is to authorize Doug Sawyer to sell the property for
 2 \$300,000 under the Court-ordered Substitution and Forfeiture Order, Order for
 3 interlocutory sale, and Final Order of Forfeiture.

4 This Motion is made and is based on the papers and pleadings on file herein and the
 5 attached Memorandum of Points and Authorities.

6 **Motion and Memorandum of Points and Authorities**

7 This Court substituted and forfeited the property, authorized the Interlocutory Sale
 8 of the property, and forfeited the property in the Final Order of Forfeiture.² This is the best
 9 offer received for the property since it was listed for sale. All other offers were under
 10 \$230,000 and as low as \$174,000. Sean McCarty offered \$300,000 to purchase the property.

11 If this Court approves the sale price and sale terms, the proceeds will be accounted
 12 for and distributed according to the law. The estimated net sale proceeds is \$263,800.

13 Under Fed. R. Crim. P. 32.2(c) and 21 U.S.C. § 853(n)(7), all possessory rights,
 14 ownership rights, and all rights, titles, and interests in the real property were extinguished
 15 and are not recognized as to all potential third parties, including the following individuals
 16 and entities:

- 17 1. Sylviane Della Whitmore, a/k/a: "Sylviane Cordova," Larry Anthony
 18 McDaniel, Phillip D. Hurbace;
- 19 2. Clark County, Nevada, including the following offices: Clark County District
 20 Attorney, Clark County Treasurer, Clark County Assessor, Clark County
 21 Recorder, Clark County Clerk, Las Vegas Valley Water District, Southern
 22 Nevada Water Authority, Clark County Water Reclamation, Clark County
 23 Commission, Clark County Board of Commissioners;
- 24 3. City of Las Vegas, including the following offices: City Attorney, City Clerk, City
 25 of Las Vegas Sewer, Public Works of City of Las Vegas;

26
 27 TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON;
 28 APN: 162-10-717-042.

² Substitution and Forfeiture Order, ECF No. 362; Order granting Motion for an
 Interlocutory Order of Sale, ECF No. 361; Final Order of Forfeiture, ECF No. 476.

- 1 4. Las Vegas International Country Club Estates Home Owners Association, Inc.;
- 2 Quadro Homeowners' Association; Sierra Community Management LLC; and
- 3 Summerlin South Community Association; and
- 4 5. Bradley Burns and Lori Burns, Kelly Douglas Card (Or Carn, Jr.), Larry Dean
- 5 Coralli, Estate of Larry Dean Coralli, Brent Lee Coralli, Lucia Garanin or Costin
- 6 or Aranin or Yaramin, Jeffrey Haeberlin, Nicole Hurbace / Nicole Gaudio;so;
- 7 Vicki Hurbace, Carl Kenneth Hurst, The Estate of Carl Kenneth Hurst, Teresa
- 8 Hurst, Deborah Mayers, Melinda Sebasovich, Kerin Schroeder, Perry Stasi,
- 9 Todd Vowell, Robert Leroy Wolfe (or Kaufman).³

10 The net sale proceeds will be held in an interest-bearing account by the Department

11 of the Treasury until resolution of the appeal, which will constitute the amount to be

12 retained by the Court as a substitute res under Supp. R. G(7)(b)(iii) and (iv).

13 The government has determined that (1) neither the buyer nor any individual who

14 will be on the title after the completion of the sale is a felon; and (2) this sale represents an

15 arms-length transaction.

16 Dated: April 12, 2024.

JASON M. FRIERSON
United States Attorney

18
19 /s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

21 IT IS SO ORDERED:

22 
23
24 ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

25 DATED: April 15, 2024

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³ Final Order of Forfeiture, ECF No. 476.